

LAW OFFICE OF GREGORY P. CAVAGNARO  
Gregory P. Cavagnaro, WSBA No. 17644  
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THE HONORABLE KAREN A. OVERSTREET  
Chapter 11  
Courtroom 7206  
Hearing Date: November 21, 2008 at 9:30 a.m.  
Response Date: November 14, 2008

**UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF WASHINGTON AT SEATTLE**

In re:	)	Case No. 05-28783
	)	
ANDERSON, RONALD E.,	)	DECLARATION OF GREGORY P. CAVAGNARO IN
	)	OPPOSITION TO DEBTOR'S MOTION TO
Debtor.	)	DISGORGE FEES
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I, Gregory P. Cavagnaro, declare:

1. I am Former Counsel to the Debtor herein. I represented the Debtor from the period beginning pre-petition of the October 15, 2005 date of filing until February 14, 2007 in the Chapter 13 case filed herein, and through its conversion to one filed under Chapter 11. I am licensed to practice law in the State of Washington. I make this declaration based on personal knowledge and under penalty of perjury of the laws of the United States of America and the State of Washington.

2. I am a practicing attorney with a private practice which I have maintained since 1990. I was admitted to practice law by the Washington State Supreme Court in 1988. I have been admitted to practice law in the United States District Court in both the Western and Eastern Districts of Washington.

3. Attached hereto as Exhibit 1 is a true and correct copy of the original fee agreement

1 executed by the Debtor herein for his Chapter 13 representation. While the rate authorized for my  
2 time under the terms of my standard fee agreement is \$250, typically my fee applications in this  
3 Court have requested only \$200 hourly. I am aware of the average hourly rate for attorneys in King,  
4 Pierce, and Snohomish Counties, and find that my hourly rate is comparable to other attorneys with  
5 similar experience.  
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7 4. Attached hereto as Exhibit 2 is the billing invoice generated by my office for the  
8 purpose of attachment to the fee application I would have noted for hearing contemporaneously to  
9 the hearing to confirm an amended Chapter 13 plan, had such a plan been able to be confirmed.  
10 Prior to the substitution of counsel, Mr. Anderson incurred legal fees in the sum of \$7,650.00 at the  
11 rate authorized under the terms of the executed fee agreement, and \$6,120.00 at the standard \$200  
12 hourly rate to which I typically reduce the invoices for the purposes of the fee application.  
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14 5. All of the work I performed is work that Mr. Anderson either requested or decided to  
15 pursue after I carefully reviewed with him the implications. Therefore, I respectfully request that  
16 this Court find that my fees were appropriate under the circumstances and deny outright the current  
17 motion to disgorge fees.  
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19 Respectfully submitted this 14th day of November, 2008.

20 LAW OFFICE OF GREGORY P. CAVAGNARO

21 /s/ Gregory P. Cavagnaro  
22 Gregory P. Cavagnaro, WSBA No. 17644  
23 Former Counsel for Debtor  
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